

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
**UNITED STATES OF AMERICA,)**

**Plaintiff,**

**v.**

**VISA U.S.A. INC.,  
VISA INTERNATIONAL CORP., AND  
MASTERCARD INTERNATIONAL  
INCORPORATED,**

**Defendants.**  
\_\_\_\_\_)

**98 Civ. 7076 (BSJ)(THK)**

**NOTICE OF DEPOSITIONS**

TO: COUNSEL FOR DEFENDANTS

PLEASE TAKE NOTICE that counsel for plaintiff United States of America will take the deposition upon oral examination of the persons listed below. The location, date and time for commencement of each deposition will be agreed among plaintiff, the witness and his counsel, unless otherwise indicated below. Without prejudice to the Government's right to take as long to complete each deposition as may be necessary, we note that our current expectation is that each listed deposition can be completed in a day. We will inform you in the future if that expectation changes. Moreover, we will inform you when we determine which, if any, depositions we intend to videotape.

<u>DEPONENT</u>	<u>LOCATION</u>	<u>DATE</u>	<u>TIME</u>
John Bennett (former EVP at Visa International)	To be agreed	To be agreed	
Carol Cove Benson (former SVP of Visa International)	To be agreed	To be agreed	

Patrick Boylan (member of Mastercard International Board of Directors)	To be agreed	To be agreed
David Brooks (former SVP, Visa USA)	To be agreed	To be agreed
Joseph Pino Francini (former EVP, Visa International)	To be agreed	To be agreed
Richard Hartnack (MasterCard US Board member)	To be agreed	To be agreed
Russ Hogg (former CEO of MasterCard International)	To be agreed	To be agreed
William Jacobs (EVP, MasterCard)	To be agreed	To be agreed
Edmund Jensen (former CEO, Visa International)	To be agreed	To be agreed
Eugene Lockhart (former CEO, MasterCard International)	To be agreed	To be agreed
Bradford Morgan (former Visa USA employee)	To be agreed	To be agreed
Filip Pinhal of Banco Commerciale Portugese; Lisbon, Portugal	Pasadena, CA (where the witness will be that day)	Oct. 7, 1999      2:00 p.m.
John Reed (co-chairman of Citigroup)	To be agreed	To be agreed
Charles Russel (former CEO, Visa USA and Visa Int'l)	To be agreed	To be agreed

You are invited to attend and participate in the examinations.

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/s/

Melvin A. Schwarz (MS8604)  
Special Counsel for Civil Enforcement  
U.S. Department of Justice  
Antitrust Division  
325 7th Street, N.W., Room 300  
Washington, DC 20530  
(202) 305-3652

Dated: Washington, D.C.  
September 15, 1999